

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS
D.T.E. 03-45**

Pursuant to 220 C.M.R. 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits the following Information Requests to Richmond Connections d/b/a Richmond NetWorx and AT&T Communications of New England, Inc.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if a party's witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If a party finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written

response.

7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Please serve a copy of the responses, via e-mail and hard copy, on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the responses each to Tina W. Chin, Hearing Officer; Michael Isenberg, Director; Rebecca Hanson, Assistant General Counsel; and Paula Foley, Assistant General Counsel.

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RICHMOND CONNECTIONS D/B/A RICHMOND NETWORKX AND
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.
D.T.E 03-45**

DTE-1-1 Please support your assertion that an in-state universal service fund is necessary for competitive local exchange carriers to compete for residential customers in Zone 4 by providing an analysis of your revenues and costs for a typical residential customer relative to Verizon's basic exchange rates.